

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION

FAMILY ONE, INDIVIDUALLY AND AS §
GUARDIANS AND NEXT FRIENDS OF §
MINOR CHILD ONE, ET AL §
§
v. § Civil Action No. 9:22cv28
§
ADAM DALE ISAACKS, MIRANDA §
LYNN DUKES ISAACKS, LITTLE §
LEAGUE BASEBALL, INC. A/K/A §
LITTLE LEAGUE INTERNATIONAL, §
ET AL §

**DEFENDANT, MIRANDA LYNN ISAACKS',
ORIGINAL ANSWER**

Comes Now, Miranda Lynn Dukes Isaacks, one of the Defendants in this case, hereinafter referred to as "Miranda" and as required by Rule 8, FRCP, files her Original Answer to the Plaintiffs' Original Complaint.

A. Admissions and Denials

1. With regards to the statements and assertions in paragraph 1 (Introduction),
Miranda denies the statements and assertions in this paragraph.
2. With regards to the statements and assertions in paragraph 2 (Introduction) ,
Miranda denies the statements and assertions in this paragraph.
3. With regards to the statements and assertions in paragraph 3 (Introduction),
Miranda denies the statements and assertions in this paragraph.
4. With regards to the statements and assertions in paragraph 4 (Introduction) ,
Miranda denies the statements and assertions in this paragraph.
5. With regards to the statements and assertions in paragraph 5 (Introduction),
Miranda denies the statements and assertions in this paragraph.

6. There is no paragraph 6.
7. With regards to the statements and assertions in paragraph 7 (Parties), Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.
8. With regards to the statements and assertions in paragraph 8 (Parties), Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.
9. With regards to the statements and assertions in paragraph 9 (Parties), Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.
10. With regards to the statements and assertions in paragraph 10 (Parties), Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.
11. With regards to the statements and assertions in paragraph 11 (Parties), Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.
12. With regards to the statements and assertions in paragraph 12 (Parties), Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.
13. With regards to the statements and assertions in paragraph 13 (Parties), Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.
14. With regards to the statements and assertions in paragraph 14 (Parties), Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.
15. With regards to the statements and assertions in paragraph 15 (Parties), Miranda denies the statements and assertions in this paragraph. As a matter of fundamental due process, Miranda must be provided the identity of the persons asserting these claims against her in order to defend these claims.
16. With regards to the statements and assertions in paragraph 16 (Parties), Miranda admits that she was married to Adam Dale Isaacks. She denies the statements and assertions in this paragraph.

17. With regards to the statements and assertions in paragraph 17 (Parties), Miranda admits that she was married to Adam Dale Isaacks. She was granted a Decree of Divorce from Adam Dale Isaacks on March 16, 2022 in Cause No. 62,986; in the 88th District Court of Hardin County Texas. She admits she is a resident of Silsbee Texas.

18. With regards to the statements and assertions in paragraph 18 (Parties), Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

19. With regards to the statements and assertions in paragraph 19 (Parties), Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

20. With regards to the statements and assertions in paragraph 20 (Parties), Miranda has knowledge of the Evadale Little League. She lacks sufficient knowledge or information of the other statements and assertions in this paragraph.

21. With regards to the statements and assertions in paragraph 21 (Parties), Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

22. With regards to the statements and assertions in paragraph 22 (Jurisdiction and Venue), Miranda denies that this court has subject matter jurisdiction over this case under 28 USC Section 1331 or supplemental jurisdiction of the other alleged claims.

23. With regards to the statements and assertions in paragraph 23 (Jurisdiction and Venue), Miranda denies the existence of any incidents for which she is responsible or liable. Therefore, she denies the statements and assertions in this paragraph.

24. With regards to the statements and assertions in paragraph 24 (Jurisdiction and Venue), Miranda denies the existence of any incidents for which she is responsible or liable. Therefore, she denies the statements and assertions in this paragraph.

25. With regards to the statements and assertions in paragraph 25 (Factual Background), Miranda denies the statements and assertions in this paragraph.

26. With regards to the statements and assertions in paragraph 26 (Facts), Miranda admits that she and other adults were unpaid volunteers for ELL. This included serving on the Board of ELL and assisting at practices and games. The other statements and assertions in this paragraph are denied.

27. With regards to the statements and assertions in paragraph 27 (Facts), Miranda denies the statements and assertions in this paragraph.

28. With regards to the statements and assertions in paragraph 28 (Facts), Miranda denies the statements and assertions in this paragraph.

29. With regards to the statements and assertions in paragraph 29 (Facts), Miranda denies the statements and assertions in this paragraph.

30. With regards to the statements and assertions in paragraph 30 (Facts), Miranda admits that she was married to Adam Isaacks and that she was a resident of Silsbee Texas. Miranda denies the remaining statements and assertions in this paragraph.

31. With regards to the statements and assertions in paragraph 31 (Facts), Miranda denies the statements and assertions in this paragraph.

32. With regards to the statements and assertions in paragraph 32 (Little League Baseball), Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

33. With regards to the statements and assertions in paragraph 33 (Little League Baseball) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

34. With regards to the statements and assertions in paragraph 34 (Little League Baseball) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

35. With regards to the statements and assertions in paragraph 35 (Evadale Little League) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

36. With regards to the statements and assertions in paragraph 36 (Texas District 12 Little League) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

37. With regards to the statements and assertions in paragraph 37 (Texas District 12 Little League) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

38. With regards to the statements and assertions in paragraph 38 (Texas District 12 Little League) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

39. With regards to the statements and assertions in paragraph 39 (District Administrator) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

40. With regards to the statements and assertions in paragraph 40 (District Administrator) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

41. With regards to the statements and assertions in paragraph 41 (District Administrator) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

42. With regards to the statements and assertions in paragraph 42 (District Administrator) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

43. With regards to the statements and assertions in paragraph 43 (District Administrator) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

44. With regards to the statements and assertions in paragraph 44 (District Administrator) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

45. With regards to the statements and assertions in paragraph 45 (District Administrator) Miranda asserts these allegations do not pertain to her. Miranda has knowledge of the annual background check. She had no role or involvement with any background checks.

46. With regards to the statements and assertions in paragraph 46 (District Administrator) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

47. With regards to the statements and assertions in paragraph 47 (District Administrator) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

48. With regards to the statements and assertions in paragraph 48 (Adam and Miranda Isaacks were in a position of trust and authority) Miranda asserts these allegations do not pertain to her. Miranda admits that Adam Isaacks was a coach of several boys' Little League baseball teams. Miranda lacks sufficient knowledge or information of the other statements and assertions in this paragraph.

49. With regards to the statements and assertions in paragraph 49 (Adam and Miranda Isaacks were in a position of trust and authority) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

50. With regards to the statements and assertions in paragraph 50 (Adam and Miranda Isaacks were in a position of trust and authority) Miranda denies the statements and assertions in this paragraph. Miranda was never an "assistant coach."

51. With regards to the statements and assertions in paragraph 51 (Adam and Miranda Isaacks were in a position of trust and authority) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

52. With regards to the statements and assertions in paragraph 52 (Adam and Miranda Isaacks were in a position of trust and authority) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

53. With regards to the statements and assertions in paragraph 53 (Adam and Miranda Isaacks were in a position of trust and authority) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

54. With regards to the statements and assertions in paragraph 54 (Adam and Miranda Isaacks were in a position of trust and authority) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

55. With regards to the statements and assertions in paragraph 55 (Adam and Miranda Isaacks were in a position of trust and authority) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

56. With regards to the statements and assertions in paragraph 56 (Little League Baseball and District 12 have independent duties and obligations to local leagues) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

57. With regards to the statements and assertions in paragraph 57 (Little League Baseball and District 12 have independent duties and obligations to local leagues) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

58. With regards to the statements and assertions in paragraph 58 (Little League Baseball and District 12 have independent duties and obligations to local leagues) Miranda asserts

these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

59. With regards to the statements and assertions in paragraph 59 (Little League Baseball and District 12 have independent duties and obligations to local leagues) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

60. With regards to the statements and assertions in paragraph 60 (Little League Baseball and District 12 have independent duties and obligations to local leagues) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

61. With regards to the statements and assertions in paragraph 61 (Little League Baseball and District 12 have independent duties and obligations to local leagues) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

62. With regards to the statements and assertions in paragraph 62 (Little League Baseball and District 12 have independent duties and obligations to local leagues) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

63. With regards to the statements and assertions in paragraph 63 (Little League Baseball and District 12 have independent duties and obligations to local leagues) Miranda asserts these allegations do not pertain to her. Miranda lacks sufficient knowledge or information of the statements and assertions in this paragraph.

64. With regards to the statements and assertions in paragraph 64 (Little League Baseball and District 12 have independent duties and obligations to local leagues) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

65. With regards to the statements and assertions in paragraph 65 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

66. With regards to the statements and assertions in paragraph 66 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

67. With regards to the statements and assertions in paragraph 67 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

68. With regards to the statements and assertions in paragraph 68 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

69. With regards to the statements and assertions in paragraph 69 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

70. With regards to the statements and assertions in paragraph 70 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

71. With regards to the statements and assertions in paragraph 71 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

72. With regards to the statements and assertions in paragraph 72 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

73. With regards to the statements and assertions in paragraph 73 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

74. With regards to the statements and assertions in paragraph 74 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

75. With regards to the statements and assertions in paragraph 75 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

76. With regards to the statements and assertions in paragraph 76 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

77. With regards to the statements and assertions in paragraph 77 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

78. With regards to the statements and assertions in paragraph 78 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

79. With regards to the statements and assertions in paragraph 79 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

80. With regards to the statements and assertions in paragraph 80 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

81. With regards to the statements and assertions in paragraph 81 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

82. With regards to the statements and assertions in paragraph 82 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

83. With regards to the statements and assertions in paragraph 83 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

84. With regards to the statements and assertions in paragraph 84 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

85. With regards to the statements and assertions in paragraph 85 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

86. With regards to the statements and assertions in paragraph 86 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

87. With regards to the statements and assertions in paragraph 87 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

88. With regards to the statements and assertions in paragraph 88 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

89. With regards to the statements and assertions in paragraph 89 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

90. With regards to the statements and assertions in paragraph 90 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

91. With regards to the statements and assertions in paragraph 91 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

92. With regards to the statements and assertions in paragraph 92 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

93. With regards to the statements and assertions in paragraph 93 (Little League President Isaacks exploited his position...) Miranda asserts these allegations do not pertain to her. Further, Miranda denies the statements and assertions in this paragraph.

94. With regards to the statements and assertions in paragraph 94 (Little League President Isaacks exploited his position...) Miranda asserts these allegations do not pertain to her. Further, Miranda denies the statements and assertions in this paragraph.

95. With regards to the statements and assertions in paragraph 95 (Little League President Isaacks exploited his position...) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

96. With regards to the statements and assertions in paragraph 96 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

97. With regards to the statements and assertions in paragraph 97 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

98. With regards to the statements and assertions in paragraph 98 (Little League President Isaacks exploited his position...) Miranda denies the statements and assertions in this paragraph.

99. With regards to the statements and assertions in paragraph 99 (Additional Facts relating to Minor Plaintiff, Child One) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

100. With regards to the statements and assertions in paragraph 100 (Additional Facts relating to Minor Plaintiff, Child Two) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

101. With regards to the statements and assertions in paragraph 101 (Additional Facts relating to Minor Plaintiff, Child Three) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

102. With regards to the statements and assertions in paragraph 102 (Additional Facts relating to Minor Plaintiff, Child Four) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

103. With regards to the statements and assertions in paragraph 103 (Additional Facts relating to Minor Plaintiff, Child Five) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

104. With regards to the statements and assertions in paragraph 104 (Additional Facts relating to Minor Plaintiff, Child Six) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

105. With regards to the statements and assertions in paragraph 105 (Additional Facts relating to Minor Plaintiff, Child Seven) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

106. With regards to the statements and assertions in paragraph 106 (Additional Facts relating to Minor Plaintiff, Child Eight) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

107. With regards to the statements and assertions in paragraph 107 (Summary of Claims) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

108. With regards to the statements and assertions in paragraph 108 (Summary of Claims) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

109. With regards to the statements and assertions in paragraph 109 (Summary of Claims), Miranda denies the statements and assertions in this paragraph.

110. With regards to the statements and assertions in paragraph 110 (Summary of Claims), Miranda denies the statements and assertions in this paragraph.

111. With regards to the statements and assertions in paragraph 111 (Summary of Claims) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

112. With regards to the statements and assertions in paragraph 112 (Summary of Claims) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

113. With regards to the statements and assertions in paragraph 113 (Summary of Claims) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

114. With regards to the statements and assertions in paragraph 114 (Summary of Claims) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

115. With regards to the statements and assertions in paragraph 115 (Summary of Claims) Miranda denies the statements and assertions in this paragraph.

116. With regards to the statements and assertions in paragraph 116 (Summary of Claims) Miranda denies the statements and assertions in this paragraph.

117. With regards to the statements and assertions in paragraph 117 (Summary of Claims) Miranda denies the statements and assertions in this paragraph.

118. With regards to the statements and assertions in paragraph 118 (Summary of Claims) Miranda denies the statements and assertions in this paragraph.

119. With regards to the statements and assertions in paragraph 119 (Summary of Claims) Miranda denies the statements and assertions in this paragraph.

120. With regards to the statements and assertions in paragraph 120 (Summary of Claims) Miranda denies the statements and assertions in this paragraph.

121. With regards to the statements and assertions in paragraph 121 (Summary of Claims) Miranda denies the statements and assertions in this paragraph.

122. With regards to the statements and assertions in paragraph 122 (Summary of Claims) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

123. With regards to the statements and assertions in paragraph 123 (Summary of Claims) Miranda denies the statements and assertions in this paragraph.

124. With regards to the statements and assertions in paragraph 124 (Summary of Claims) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

125. With regards to the statements and assertions in paragraph 125 (Summary of Claims) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

126. With regards to the statements and assertions in paragraph 126 (Summary of Claims) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

127. With regards to the statements and assertions in paragraph 127 (Summary of Claims) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

128. With regards to the statements and assertions in paragraph 128 (Causes of Action – Count One – Assault) Miranda asserts her responses and defenses to the earlier paragraphs as they are incorporated into this paragraph.

129. With regards to the statements and assertions in paragraph 129 (Causes of Action – Count One – Assault) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

130. With regards to the statements and assertions in paragraph 130 (Causes of Action – Count One – Assault) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

131. With regards to the statements and assertions in paragraph 131 (Causes of Action – Count One – Assault) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

132. With regards to the statements and assertions in paragraph 132 (Causes of Action – Count One – Assault) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

133. With regards to the statements and assertions in paragraph 133 (Causes of Action – Count One – Assault) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

134. With regards to the statements and assertions in paragraph 134 (Causes of Action – Count One – Assault) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

135. With regards to the statements and assertions in paragraph 135 (Causes of Action – Count Two – Sexual Abuse) Miranda asserts her responses and defenses to the earlier paragraphs as they are incorporated into this paragraph.

136. With regards to the statements and assertions in paragraph 136 (Causes of Action – Count Two -Sexual Abuse) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

137. With regards to the statements and assertions in paragraph 137 (Causes of Action – Count Three – Negligence) Miranda asserts her responses and defenses to the earlier paragraphs as they are incorporated into this paragraph.

138. With regards to the statements and assertions in paragraph 138 (Causes of Action – Count Three – Negligence) Miranda denies the statements and assertions in this paragraph.

139. With regards to the statements and assertions in paragraph 139 (Causes of Action – Count Three – Negligence) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

140. With regards to the statements and assertions in paragraph 140 (Causes of Action – Count Three – Negligence) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

141. With regards to the statements and assertions in paragraph 141 (Causes of Action – Count Three – Negligence) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

142. With regards to the statements and assertions in paragraph 142 (Causes of Action – Count Three – Negligence) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

143. With regards to the statements and assertions in paragraph 143 (Causes of Action – Count Three – Negligence) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

144. With regards to the statements and assertions in paragraph 144 (Causes of Action – Count Three – Negligence) Miranda denies the statements and assertions in this paragraph.

145. With regards to the statements and assertions in paragraph 145 (Causes of Action – Count Three – Negligence) Miranda denies the statements and assertions in this paragraph.

146. With regards to the statements and assertions in paragraph 146 (Causes of Action – Count Three – Negligence) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

147. With regards to the statements and assertions in paragraph 147 (Causes of Action – Count Three – Negligence) Miranda denies the statements and assertions in this paragraph.

148. With regards to the statements and assertions in paragraph 148 (Causes of Action – Count Three – Negligence) Miranda denies the statements and assertions in this paragraph.

149. With regards to the statements and assertions in paragraph 149 (Causes of Action – Count Three – Negligence) Miranda denies the statements and assertions in this paragraph.

150. With regards to the statements and assertions in paragraph 150 (Causes of Action – Count Three – Negligence) Miranda denies the statements and assertions in this paragraph.

151. With regards to the statements and assertions in paragraph 151 (Causes of Action – Count Three – Negligence) Miranda denies the statements and assertions in this paragraph.

152. With regards to the statements and assertions in paragraph 152 (Causes of Action – Count Three – Negligence) Miranda denies the statements and assertions in this paragraph.

153. With regards to the statements and assertions in paragraph 153 (Causes of Action – Count Three – Negligence) Miranda denies the statements and assertions in this paragraph.

154. With regards to the statements and assertions in paragraph 154 (Causes of Action – Count Three – Negligence) Miranda denies the statements and assertions in this paragraph.

155. With regards to the statements and assertions in paragraph 155 (Causes of Action – Count Three – Negligence Per Se) Miranda denies the statements and assertions in this paragraph.

156. With regards to the statements and assertions in paragraph 156 (Causes of Action – Count Three – Negligence Defendant Bear Creek) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

157. With regards to the statements and assertions in paragraph 157 (Causes of Action – Count Three – Negligence Defendant Bear Creek) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

158. With regards to the statements and assertions in paragraph 158 (Causes of Action – Count Three – Negligence Defendant Bear Creek) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

159. With regards to the statements and assertions in paragraph 159 (Causes of Action – Count Three – Negligence Defendant Bear Creek) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

160. With regards to the statements and assertions in paragraph 160 (Causes of Action – Count Three – Negligence Defendant Bear Creek) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

161. With regards to the statements and assertions in paragraph 161 (Causes of Action – Count Four – Gross Negligence) Miranda asserts her responses and defenses to the earlier paragraphs as they are incorporated into this paragraph.

162. With regards to the statements and assertions in paragraph 162 (Causes of Action – Count Four – Gross Negligence) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

163. With regards to the statements and assertions in paragraph 163 (Causes of Action – Count Four – Gross Negligence) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

164. With regards to the statements and assertions in paragraph 164 (Causes of Action – Count Four – Gross Negligence) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

165. With regards to the statements and assertions in paragraph 165 (Causes of Action – Count Four – Gross Negligence) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

166. With regards to the statements and assertions in paragraph 166 (Causes of Action – Count Four – Gross Negligence) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

167. With regards to the statements and assertions in paragraph 167 (Causes of Action – Count Five – “Safe Sports Act”) Miranda asserts her responses and defenses to the earlier paragraphs as they are incorporated into this paragraph.

168. With regards to the statements and assertions in paragraph 168 (Causes of Action – Count Five –“Safe Sports Act) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

169. With regards to the statements and assertions in paragraph 169 (Causes of Action – Count Five –“Safe Sports Act) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

170. With regards to the statements and assertions in paragraph 170 (Causes of Action – Count Five –“Safe Sports Act) Miranda denies the statements and assertions in this paragraph.

171. With regards to the statements and assertions in paragraph 171 (Causes of Action

– Count Five –“Safe Sports Act) Miranda denies the statements and assertions in this paragraph.

172. With regards to the statements and assertions in paragraph 172 (Causes of Action

– Count Five –“Safe Sports Act) Miranda denies the statements and assertions in this paragraph.

173. With regards to the statements and assertions in paragraph 173 (Causes of Action

– Count Six – Sexual Exploitation -Federal Anti-human Trafficking statutes) Miranda asserts her responses and defenses to the earlier paragraphs as they are incorporated into this paragraph.

174. With regards to the statements and assertions in paragraph 174 (Causes of Action

– Count Six – Sexual Exploitation -Federal Anti-human Trafficking statutes) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

175. With regards to the statements and assertions in paragraph 175 (Causes of Action

– Count Six – Sexual Exploitation -Federal Anti-human Trafficking statutes) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

176. With regards to the statements and assertions in paragraph 176 (Causes of Action

– Count Six – Sexual Exploitation -Federal Anti-human Trafficking statutes) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

177. With regards to the statements and assertions in paragraph 177 (Causes of Action

– Count Seven – Civil Conspiracy) Miranda asserts her responses and defenses to the earlier paragraphs as they are incorporated into this paragraph.

178. With regards to the statements and assertions in paragraph 178 (Causes of Action

– Count Seven – Civil Conspiracy) Miranda denies the statements and assertions in this paragraph.

179. With regards to the statements and assertions in paragraph 179 (Causes of Action

– Count Eight – Aiding and Abetting) Miranda asserts her responses and defenses to the earlier paragraphs as they are incorporated into this paragraph.

180. With regards to the statements and assertions in paragraph 180 (Causes of Action – Count Eight – Aiding and Abetting) Miranda denies the statements and assertions in this paragraph.

181. With regards to the statements and assertions in paragraph 181 (Causes of Action – Count Nine – Defective Premises) Miranda asserts her responses and defenses to the earlier paragraphs as they are incorporated into this paragraph.

182. With regards to the statements and assertions in paragraph 182 (Causes of Action – Count Nine – Defective Premises) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

183. With regards to the statements and assertions in paragraph 183 (Causes of Action – Count Nine – Defective Premises) Miranda asserts these allegations do not pertain to her. Miranda denies the statements and assertions in this paragraph.

184. With regards to the statements and assertions in paragraph 184 (Causes of Action – Count Ten – Breach of Fiduciary Duty) Miranda asserts her responses and defenses to the earlier paragraphs as they are incorporated into this paragraph.

185. With regards to the statements and assertions in paragraph 185 (Causes of Action – Count Ten – Breach of Fiduciary Duty) Miranda denies the statements and assertions in this paragraph.

186. With regards to the statements and assertions in paragraph 186 (Causes of Action – Count Ten – Breach of Fiduciary Duty) Miranda denies the statements and assertions in this paragraph.

187. With regards to the statements and assertions in paragraph 187 (Causes of Action – Count Ten – Breach of Fiduciary Duty) Miranda denies the statements and assertions in this paragraph.

188. With regards to the statements and assertions in paragraph 188 (Damages) Miranda denies the statements and assertions in this paragraph.

189. With regards to the statements and assertions in paragraph 189 (Damages for Family One and Minor Plaintiff One) Miranda denies the statements and assertions in this paragraph.

190. With regards to the statements and assertions in paragraph 190 (Damages for Family One and Minor Plaintiff One) Miranda denies the statements and assertions in this paragraph.

191. With regards to the statements and assertions in paragraph 191 (Damages for Family One and Minor Plaintiff One) Miranda denies the statements and assertions in this paragraph.

192. With regards to the statements and assertions in paragraph 192 (Damages for Family One and Minor Plaintiff One) Miranda denies the statements and assertions in this paragraph.

193. With regards to the statements and assertions in paragraph 193 (Damages for Family One and Minor Plaintiff One) Miranda denies the statements and assertions in this paragraph.

194. With regards to the statements and assertions in paragraph 194 (Damages for Family Two and Minor Plaintiff Two) Miranda denies the statements and assertions in this paragraph.

195. With regards to the statements and assertions in paragraph 195 (Damages for Family Two and Minor Plaintiff Two) Miranda denies the statements and assertions in this paragraph.

196. With regards to the statements and assertions in paragraph 196 (Damages for Family Two and Minor Plaintiff Two) Miranda denies the statements and assertions in this paragraph,

197. With regards to the statements and assertions in paragraph 197 (Damages for Family Two and Minor Plaintiff Two) Miranda denies the statements and assertions in this paragraph.

198. With regards to the statements and assertions in paragraph 198 (Damages for Family Two and Minor Plaintiff Two) Miranda denies the statements and assertions in this paragraph.

199. With regards to the statements and assertions in paragraph 199 (Damages for Family Three and Minor Plaintiff Three) Miranda denies the statements and assertions in this paragraph.

200. With regards to the statements and assertions in paragraph 200 (Damages for Family Three and Minor Plaintiff Three) Miranda denies the statements and assertions in this paragraph.

201. With regards to the statements and assertions in paragraph 201 (Damages for Family Three and Minor Plaintiff Three) Miranda denies the statements and assertions in this paragraph,

202. With regards to the statements and assertions in paragraph 202 (Damages for Family Three and Minor Plaintiff Three) Miranda denies the statements and assertions in this paragraph.

203. With regards to the statements and assertions in paragraph 203 (Damages for Family Three and Minor Plaintiff Three) Miranda denies the statements and assertions in this paragraph.

204. With regards to the statements and assertions in paragraph 204 (Damages for Family Four and Minor Plaintiff Four) Miranda denies the statements and assertions in this paragraph.

205. With regards to the statements and assertions in paragraph 205 (Damages for Family Four and Minor Plaintiff Four) Miranda denies the statements and assertions in this paragraph.

206. With regards to the statements and assertions in paragraph 206 (Damages for Family Four and Minor Plaintiff Four) Miranda denies the statements and assertions in this paragraph.

207. With regards to the statements and assertions in paragraph 207 (Damages for Family Four and Minor Plaintiff Four) Miranda denies the statements and assertions in this paragraph.

208. With regards to the statements and assertions in paragraph 208 (Damages for Family Four and Minor Plaintiff Four) Miranda denies the statements and assertions in this paragraph.

209. With regards to the statements and assertions in paragraph 209 (Damages for Family Five and Minor Plaintiff Five) Miranda denies the statements and assertions in this paragraph.

210. With regards to the statements and assertions in paragraph 210 (Damages for Family Five and Minor Plaintiff Five) Miranda denies the statements and assertions in this paragraph.

211. With regards to the statements and assertions in paragraph 211 (Damages for Family Five and Minor Plaintiff Five) Miranda denies the statements and assertions in this paragraph.

212. With regards to the statements and assertions in paragraph 212 (Damages for Family Five and Minor Plaintiff Five) Miranda denies the statements and assertions in this paragraph.

213. With regards to the statements and assertions in paragraph 213 (Damages for Family Five and Minor Plaintiff Five) Miranda denies the statements and assertions in this paragraph.

214. With regards to the statements and assertions in paragraph 214 (Damages for Family Six and Minor Plaintiff Six) Miranda denies the statements and assertions in this paragraph.

215. With regards to the statements and assertions in paragraph 215 (Damages for Family Six and Minor Plaintiff Six) Miranda denies the statements and assertions in this paragraph.

216. With regards to the statements and assertions in paragraph 216 (Damages for Family Six and Minor Plaintiff Six) Miranda denies the statements and assertions in this paragraph.

217. With regards to the statements and assertions in paragraph 217 (Damages for Family Six and Minor Plaintiff Six) Miranda denies the statements and assertions in this paragraph.

218. With regards to the statements and assertions in paragraph 218 (Damages for Family Six and Minor Plaintiff Six) Miranda denies the statements and assertions in this paragraph.

219. With regards to the statements and assertions in paragraph 219 (Damages for Family Seven and Minor Plaintiff Seven) Miranda denies the statements and assertions in this paragraph.

220. With regards to the statements and assertions in paragraph 220 (Damages for Family Seven and Minor Plaintiff Seven) Miranda denies the statements and assertions in this paragraph.

221. With regards to the statements and assertions in paragraph 221 (Damages for Family Seven and Minor Plaintiff Seven) Miranda denies the statements and assertions in this paragraph.

222. With regards to the statements and assertions in paragraph 222 (Damages for Family Seven and Minor Plaintiff Seven) Miranda denies the statements and assertions in this paragraph.

223. With regards to the statements and assertions in paragraph 223 (Damages for Family Seven and Minor Plaintiff Seven) Miranda denies the statements and assertions in this paragraph.

224. With regards to the statements and assertions in paragraph 224 (Damages for Family Eight and Minor Plaintiff Eight) Miranda denies the statements and assertions in this paragraph.

225. With regards to the statements and assertions in paragraph 225 (Damages for Family Eight and Minor Plaintiff Eight) Miranda denies the statements and assertions in this paragraph.

226. With regards to the statements and assertions in paragraph 226 (Damages for Family Eight and Minor Plaintiff Eight) Miranda denies the statements and assertions in this paragraph.

227. With regards to the statements and assertions in paragraph 227 (Damages for Family Eight and Minor Plaintiff Eight) Miranda denies the statements and assertions in this paragraph.

228. With regards to the statements and assertions in paragraph 228 (Punitive Damages) Miranda denies the statements and assertions in this paragraph. Miranda asserts that any punitive damages are limited under the statutory cap provided by Texas Civil Practice and Remedies Code § 41.008(b). Any award of punitive damages against Miranda is limited by the Due Process Clause of the United States Constitution or the Due Course of Law provisions of the Texas Constitution. Miranda also asserts mitigation of any punitive damages.

229. With regards to the statements and assertions in paragraph 229 (Jury Demand) no answer to this paragraph is required by Miranda.

230. With regards to the statements and assertions in paragraph 230 (Attorney's Fees, Interest and Costs) Miranda denies the statements and assertions in this paragraph.

231. With regards to the statements and assertions in paragraph 231 (Conditions Precedent) Miranda denies the statements and assertions in this paragraph.

232. With regards to the statements and assertions in paragraph 232 (Alternative Pleadings) Miranda denies the statements and assertions in this paragraph.

233. With regards to the statements and assertions in paragraph 233 (Relief Requested) Miranda denies that Plaintiffs are entitled to recover from Miranda any of the damages and relief asserted in this paragraph.

234. With regards to the statements and assertions in the Prayer for Relief on page 62 of Plaintiffs Original Complaint filed February 28, 2022, Miranda denies that Plaintiffs are entitled to recover from Miranda any of the damages and relief asserted in this paragraph.

B. Miranda's Defenses and Affirmative Defenses

235. As set forth in paragraphs 94 and 95 of the Plaintiffs' Original Complaint, Defendant, Adam Isaacks' conduct, if any, was done in secret. Miranda had no knowledge, information or suspicions about Adam Isaacks until his arrest on December 30, 2021. Therefore, Miranda denies that she knew or should have known about Adam Isaacks' conduct.

236. Adam Isaacks' conduct, if any, was the sole responsibility of Adam Isaacks, and a superseding cause of any harm allegedly sustained by the Plaintiffs. Miranda had no duty or responsibility concerning or liability for Adam Isaacks' conduct, intentional or otherwise.

237. Contrary to the assertions in paragraph 29, with regard to Evadale Little League, because of the limited number of participants, there were no tryouts as everyone is assigned to a team. Each team for each age group has one team with the minimum number of players and often must share players. There is no "sitting the bench" or concerns about the lack of playing time. The ELL "interleagues" with other teams, because it has so few players. It draws players from other communities. The registration fee was waived for several boys whose families had limited financial resources.

C. Prayer

For these reasons, Defendant, Miranda Lynn Isaacks asks the Court to enter Judgment that Plaintiffs take nothing from Miranda and that she be discharged from any liability to the Plaintiffs; recover her court costs, and such other relief to which she may be entitled.

Respectfully submitted,

By: /s/ Bruce M. Partain

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CERTIFICATE OF SERVICE

I certify that on the 4th day of April, 2022, I have provided a true and correct copy of the above documents as indicated below.

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